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December 29, 2022

Hon. Nina R. Morrison, United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Hon. Ramon E. Reyes Jr., United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

VIA ECF ONLY

Re: Polina Baratova v. Sophia Collier, 22-cv-02898-NM-RER
Update to November 17, 2022 Request for Pre-Motion Conference

Dear Judge Morrison and Judge Reyes,

This firm represents the Defendant, Sophia Collier, in the above-captioned action. Defendant writes to update the Court on her prior letter of November 17, 2022, ECF Document No. 19, which requested a pre-motion conference on a proposed motion, pursuant to Rule 60(b), to vacate the Clerk's entry of default of October 11, 2022, Docket No. 13.

I am pleased to report that the parties have agreed to the vacatur of Ms. Collier's default. A stipulation to that effect, with a request that the Court so-order the stipulation, has been filed today as ECF Document No. 20.

With respect to the pre-motion conference currently scheduled before Judge Reyes on January 4, 2023, Defendant respectfully requests that the agenda for the conference be

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modified solely to address her anticipated motion, pursuant to Rule 12, to dismiss the Complaint, for the reasons elaborated in her letter of November 17, 2022.

The Court's consideration is greatly appreciated.

Respectfully,
ABRAMS FENSTERMAN, LLP

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cc: ALL APPEARING PARTIES VIA ECF